


Getting in Gear with the Medicaid Schools Program



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Medicaid:
Medical Necessity
Efficacy of treatment
Progress Reporting




Educational benefit

IDEA:
Collaborative IEP Process
Related Service Provider
Educational progress

Finding Common Ground

Purpose


- Importance of a documentation strategy
- Considerations for acceptable documentation
- Medicaid audit findings




The Paradox

How do we deliver medical services and demonstrate educational progress?

The Therapist Perspective






The development of a therapy-specific intervention/treatment plan is an expectation of all OTs and PTs, regardless of treatment setting, as defined by their respective Standards of Practice.

Documentation of OT and PT services in any setting, including school-based practice, should follow the established professional standards as defined by the professional organization.

This includes daily, point-of-service notes and the development and documentation of an *intervention plan*, regardless of practice setting.

Therapy Intervention Plan

IDEA is referring to an *educational* plan and not a therapy- specific plan that identifies the unique interventions and clinical reasoning used by a therapist.



But...IDEA uses the language of "Plan of Care"

IEP goals and objectives are to be written by the education team and do not constitute the OT or PT intervention plan.

The IEP alone is not sufficient as a plan of therapy intervention/treatment.

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The Medicaid Perspective

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Documentation Strategy:

Medical Necessity




Spec Ed Evals
IEPs
Objectives
Related Services
Therapist Treatment Plan
'the Golden Thread'

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Documentation Strategy: Progress Reporting


- Ongoing progress reporting
 - Medical v educational aspects
 - Licensure requirements
 - Treatment notes
 - PLOP
 - Report cards



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Documentation Considerations

- Physical location
 - Accessibility
- Define your process
- Why do things twice when once will suffice?
 - Can you streamline your work to meet multiple objectives?



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Medicaid Audits

- There are multiple paths to adequate documentation
- CMS auditors seek to reasonably assure both payments and services are appropriate through available documentation
- CMS auditors review *defined* expectations against *demonstrated* realities

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Audit language

- Reemphasized the Medicaid policies to providers and require them to implement effective internal controls to ensure SBS are properly provided, billed and documented.



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Medicaid Audits

What are the requirements for billing Direct Medical Services?


1. The child must be between the ages of 3 – 21
2. Child must be Medicaid eligible at the time of service.
3. Child's IEP must document the medical necessity services (once the educational goals are established).
4. Signed Parental Consent (currently under reconsideration)
5. Services must be delivered by an approved provider.
6. **Services must be properly documented.**

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Federal Audits of MA SBS

Since 2003.....

- Examples of states that have had to pay back
 - MD \$20 million
 - NJ \$5.6 million
 - IL \$6 million
 - VT \$1.5 million
 - AZ \$21.2 million
 - TX \$8.7 million
 - NJ \$51.2 million



Government Accountability Office (GAO). Medicaid: States Efforts to maximize Federal Reimbursement Highlight Need for Improved Oversight. [GAO-05-836T, June 28, 2005](#)

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Common Findings That Resulted in Payback

- Providers not qualified to render the service
- Student was absent or service did not occur with appropriate participant
- Services not authorized or in excess of the quantity authorized
- Services not included in IEP
- No referral or prescription
- **Services insufficiently documented**

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Practitioner Practice Standard & Auditor Rationale

If you can't prove it = it didn't happen

If it didn't happen = no reason to pay

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Sufficiently document services


- Local Requirements
 - Develop written policies and procedures requiring service providers to document all health services delivered to MA recipients which details client specific information regarding all specific services actually provided for each individual recipient of services and retain those records for review.

(Medicaid Payments for School-based Health Services – Haverhill, MA and Bedford MA)

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Sufficiently document services


- State Requirements
 - State's handbook for school-based services
 - State legal(licensure) requirements for practice



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Sufficiently document services

- Federal requirements
 - Comply with CMS Technical Assistance Guide: School must keep organized and confidential records that details client-specific information regarding all specific services.



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Conclusions

- Professional documentation standards exist for meeting documentation requirements
- Looking for common language and understanding of special education regulations and the need to support medical necessity of OT, PT and Speech as related services in the educational setting.

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The Paradox Answered

How do we deliver medical services and demonstrate educational progress?

Through documentation of skilled service therapies, we remove barriers and maximize a student's ability to learn.

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- Articulation

In a 20 minute conversation, Zach will articulate all speech phonemes clearly and understandably in all positions of words with 80% or greater accuracy over 4 consecutive observed conversations by the end of the school year.

Speech-Language IEP Goal

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- Language

Given a reading sample of second grade content material, Erin will make inferences about what she has read by processing the language in the material, as evidenced by answering at least 4 out of 5 inferential questions about the material across 4 consecutive sessions by the end of the school year.

Speech-Language IEP Goal

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Fluency

In a 20 minute observed conversation, Maddy will speak clearly and understandably by speaking fluently at least 80% of the time across four consecutive sessions by the end of the school year.

Speech-Language IEP Goal

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Pragmatics

When Austin needs to leave a classroom for a sensory break, he will calmly give his teacher one of his pre-arranged passes and quietly leave the classroom in 4 out of 5 occurrences in 100% of his classes by the end of the school year.

Speech-language IEP Goal

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